

# **Exhibit A**

Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
1	Declaration of Dr. Mutlib Bin Abdullah Al Nafissa, Member of the Council of Ministers of the Kingdom of Saudi Arabia.	Averment at ¶ 5	7, 8	Declaration discussing the relationship between the Kingdom and the SHC. Concerns the relationship between the Kingdom and a charity as to which no action in the United States has been alleged.
2	October 1998 Department of Defense Intelligence Agency Report, <i>IIR[REDACTED ]/Swift Knight -Usam Ben Laden's Current and Historical Activities</i> .	Averment at ¶¶ 28, 452	1, 3, 4, 5, 6, 7	Memorandum with author redacted, purporting to be a translation and/or summary of another "handwritten document" about Osama bin Laden whose author is not identified. Describes itself as an "information report" that is "not finally evaluated intelligence." Concerns activities outside the United States.
3	Testimony of Stuart A. Levey, Undersecretary of Terrorism and Financial Intelligence, U.S. Department of the Treasury Press Release, August 23, 2004	Averment at ¶ 35	2, 4, 8	Legislative testimony, repeated in a press release. Does not appear to be based on personal knowledge. Concerns indirect funding for terrorist activities.
4	Testimony of Stuart A. Levey, Undersecretary of Terrorism and Financial Intelligence, before the U.S. House Financial Services Subcommittee on Oversight and Investigations, U.S. Department of the Treasury Press Release, July 11, 2006	Averment at ¶ 35	2, 4, 8	Legislative testimony, repeated in a press release. Does not appear to be based on personal knowledge. Concerns indirect funding for terrorist activities.
5	Prepared Remarks of Daniel L. Glaser, Acting Assistant Secretary for Terrorist Financing and Financial Crimes before the Annual Meetings Program of Seminars: The Importance of Expanding Targeted Financial Transactions Programs Around the Globe: Challenges and Opportunities, September 23, 2005	Averment at ¶ 35	2, 4, 8	Legislative testimony, repeated in a press release. Does not appear to be based on personal knowledge. Concerns indirect funding for terrorist activities.
6	Michael Jacobsen and Matthew Levitt, <i>The Money Trail: Finding, Following and Freezing Terrorist Finances</i> , The Washington Institute for Near East Policy, Policy Focus #89, November 2008, p. 3	Averment at ¶ 35	1, 3, 4, 8	Policy paper concerning indirect funding for terrorist activities.
7	Michael J. Jacobsen and Matthew Levitt, <i>Follow the Money</i> , Los Angeles Times, December 23, 2008	Averment at ¶ 35	1, 2, 4	Newspaper article or editorial. Concerns prevention of indirect funding for terrorist activities.

- 1. Unsworn hearsay
- 2. Hearsay without cross-examination
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8	U.N. Security Council Committee, <i>Second Report of the Monitoring Group on Al Qaida</i> , December 2, 2003	Averment at ¶¶ 40, 419, 421, 570	4, 8	Report of UN monitoring group. Concerns prevention of indirect funding for terrorist activities.
9	March 20, 2000 letter from the General Director of the Muslim World League's branch office in Pakistan to Sheikh Abu Hafs	Averment at ¶¶ 47, 48, 286, 287, 289	5, 7, 8	Handwritten letter with attached translation on letterhead purporting to be that of a "General Director" of the MWL. The author is not identified in the Averment or elsewhere. Neither the letter nor the translation are authenticated, and the translation is not certified. Concerns alleged transfer of funds from charities to terrorists outside the United States.
10	May 13, 1999 letter from the Main Regional Office of the International Islamic Relief Organization in Peshawar, Pakistan to Abu Hafs	Averment at ¶¶ 47, 48, 286, 287, 289	5, 7, 8	Handwritten letter with translation, attributed to "Abu Sajidah," on letterhead purporting to be that of the MWL and/or IIRO. The author is not further identified in the Averment or elsewhere. Neither the letter nor the translation are authenticated, and the translation is not certified. Concerns alleged transfer of funds from charities to terrorists outside the United States.
11	July 12, 1999 letter from the Main Regional Office of the International Islamic Relief Organization in Peshawar, Pakistan to Abdul Hadi al Iraqi	Averment at ¶¶ 47, 48, 286, 287, 289	5, 7, 8	Handwritten letter with translation on letterhead purporting to be that of the MWL and/or IIRO. The author is not identified in the Averment or elsewhere. Neither the letter nor the translation are authenticated, and the translation is not certified. Concerns alleged transfer of funds from charities to terrorists outside the United States. (On its face, the translation states that it concerns "donations earmarked for orphans and widows.")
12	April 27, 2007 Department of Defense News Release, <i>Defense Department Takes Custody of a High-Value Detainee</i> [Abdul Hadi al Iraqi].	Averment at ¶¶ 47, 48, 286, 287, 289	1, 4, 7	Press release concerning detention of alleged terrorist combatant at Guantanamo Bay, and concerning alleged acts taking place outside the United States.

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13	April 25, 2000 letter from Chief Al-Haj Maulawi Abdul-Kabir Akhund to the "managing director of the Islamic League Trust."	Averment at ¶¶ 47, 48, 286, 287, 289	5, 7, 8	Handwritten letter with translation, attributed to Maulawi Abdul-Kabir, purportedly an official of the Taliban. Recipient is stated to be a "managing director of the Islamic League Trust"; neither recipient nor organization is further identified in the Averment or elsewhere. Neither the letter nor the translation are authenticated, and the translation is not certified; many words are omitted as illegible. Concerns alleged transfer of funds from charities to terrorists outside the United States.
14	Helen Chapin Metz, <i>Saudi Arabia, A Country Study</i> , Federal Research Division, Library of Congress, December 1992, pp. 208-209	Averment at ¶¶ 60-64	4, 5, 7, 8	Excerpt from book about the Kingdom from 1992.
15	Wa'el Hamza Jelaidan's Curriculum Vitae	Averment at ¶82	5, 7, 8	Document purporting to be a "curriculum vitae" for Wa'el Jelaidan. Unauthenticated. Concerns alleged transfers of funds from charities to terrorists outside the United States (which the author of the document denies).
16	Transcript, <i>A Conversation with Prince Turki Al Faisal</i> , Council on Foreign Relations, February 13, 2006	Averment at ¶ 88	8	Transcript of statements by Prince Turki al-Faisal. Describes a meeting with Osama bin Laden in 1990; states that by 1994 bin Laden was stripped of his Saudi citizenship and had his assets frozen, and that by 1995 bin Laden was committing terrorist acts against the Kingdom. Concerns alleged terrorist activities (against the Kingdom) outside the United States.
17	Michael Scheuer, <i>Osama Bin Laden</i> , pp. 76-77 (2011)	Averment at ¶ 90	1, 3, 4, 7	Excerpt from book about Osama bin Laden. Concerns alleged terrorist activities outside the United States.
18	Lawrence Wright, <i>The Looming Tower: Al-Qaeda and the Road to 9/11</i> , pp. 150-151, 405 (2011)	Averment at ¶ 91	1, 3, 4, 7	Excerpt from book about Osama bin Laden. Concerns alleged terrorist activities outside the United States.
19	The Letter of Demands ("Kitab Al Matalib"), as printed in the Egyptian newspaper Al-Sha'ab on May 21, 1991, including excerpts from Anders Jerichow, <i>The Saudi File</i> , Chapter 4 ("Political Reform"), pp. 52-54 (1998)	Averment at ¶¶ 106, 107, 290	1, 3, 4, 7	Arabic document with uncertified English translation excerpted from a book about the Kingdom, plus commentary. The translation and at least some of the commentary are not by the author of the book but are attributed to another organization termed, "Middle East Watch." Concerns activities outside the United States.

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20	The Memorandum of Advice, including excerpts from Mamoun Fandy, <i>Saudi Arabia and the Politics of Dissent</i> , pp. 50-60 (2001).	Averment at ¶¶ 108, 109, 290	1, 3, 4, 7	Arabic document with English commentary (not a translation, except for one short passage) excerpted from book about the Kingdom. Concerns activities outside the United States.
21	Saudi Arabian Royal Decree published in Umm Al-Qura [Saudi Arabia's official newspaper], Year 70, Issue 3462, July 16, 1993.	Averment at ¶¶ 114, 115	7	Arabic document with English translation. Concerns activities outside the United States.
22	Notification by the Muslim World League ("MWL") and International Islamic Relief Organization ("IIRO") that Mohammed Jamal Khalifa is the Regional Director for the IIRO in South-East Asia	Averment at ¶¶ 136, 350	1, 7	Documents apparently on MWL / IIRO letterhead, stating that an individual named Mohammed Jamal Khalifa is a Regional Director for the IIRO. Concerns alleged terrorist activities outside the United States.
23	Affirmation of Daniel Robert "Bob" Graham, <i>In Re: Terrorist Attacks on September 11, 2001</i> , MDL Case No. 1:03-md-01570, ECF No. 2558.	Averment at ¶¶ 152, 190, 245	2, 4	Affirmation not based on personal knowledge. See Reply 13-14.
24	Affirmation of Joseph Robert "Bob" Kerrey, <i>In Re: Terrorist Attacks on September 11, 2001</i> , MDL Case No. 1:03-md-01570, ECF No. 2557-3.	Averment at ¶ 244	2, 4	Affirmation not based on personal knowledge. See Reply 13-14.
25	Michael Isikoff, <i>Failure to Communicate</i> , Newsweek, August 3, 2003	Averment at ¶ 152	1, 3, 4, 5, 6	Newspaper article relying in part on anonymous sources. Contains statements about the preliminary stages of an investigation.
26	Senator Bob Graham, <i>Intelligence Matters: The CIA, the FBI, Saudi Arabia, and the Failure of America's War on Terror</i> , pp. 11-13, 18-21, 24, 25, 166-169 (2004)	Averment at ¶¶ 154, 155, 161, 162, 172, 175, 179, 181, 190, 196-198, 201, 209, 219, 220	1, 3, 4, 6	Excerpts from book about the 9/11 attacks. Contains statements about the preliminary stages of an investigation.
27	"Tareekh Osama" (or "Osama's History") document identifying the principal financiers of al Qaeda (the "Golden Chain").	Averment at ¶ 156	1, 3, 4, 5, 7	Handwritten Arabic document, apparently a list of names, prepared by an unidentified author, with uncertified English translation by an unidentified translator. Neither the original nor the translation are authenticated. Plaintiffs' description of this document (contained in their Index) does not appear to be from personal knowledge. Concerns alleged funding for terrorist activities outside the United States. See Reply 18 & n.32.

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28	Testimony of Jamal al Fadl, August 29, 2002 [Fadl, a former al Qaeda leader who repudiated Osama bin Laden in the 1990's and has appeared as a principal government witness in numerous al Qaeda terrorist trials, confirmed the existence of the Golden Chain and specifically identified Saleh Kamel, Yousef Jameel, Wael Jelaidan, Adel Batterjee and others as direct financiers and facilitators of al Qaeda.].	Averment at ¶ 156	1, 3, 4, 5, 7	Memorandum by an unidentified author summarizing statements attributed to an unnamed "Source." Plaintiffs' description of this document (contained in brackets from in their Index) does not appear to be from personal knowledge. Concerns alleged terrorist activities outside the United States.
29	Penal Law on Dissemination and Disclosure of Classified Information and Documents, Royal Decree No. M/35, December 4, 2011.	Averment at ¶ 157	n/a	English translation of a Saudi royal decree that concerns the protection of classified and confidential material. Does not fit the listed categories, but is not evidence.
30	9/11 Commission Memorandum for the Record, Interview of Omar al Bayoumi, October 16-18, 2003.	Averment at ¶¶ 153, 154, 159, 161, 167, 172, 174, 204	1, 3	Memorandum summarizing statements made during investigative interview.
31	9/11 Commission Memorandum for the Record, Interview of Fahad al Thumairy, February 23-25, 2004	Averment at ¶¶ 163, 164, 168, 169	1, 3	Memorandum summarizing statements made during investigative interview.
32	9/11 Commission Memorandum for the Record, Interview of Cayson bin Don, April 20, 2004	Averment at ¶¶ 161, 172, 179	1, 3	Memorandum summarizing statements made during investigative interview.
33	9/11 Commission Memorandum for the Record, Interview of FBI Special Agent, November 17, 2003	Averment at ¶¶ 173, 199, 204, 205	1, 3, 4, 6	Memorandum summarizing statements made during investigative interview. Contains statements about the preliminary stages of an investigation.
34	9/11 Commission Memorandum for the Record, Interview of Osama Basnan, October 21-22, 2003	Averment at ¶¶ 197, 198, 204	1, 3, 6	Memorandum summarizing statements made during investigative interview. Contains statements about the preliminary stages of an investigation.
35	FBI Report, <i>Fahad Althumairy (NON-USPER), IT-OTHER (UBL/AL-QAEDA)</i> , September 4, 2002	Averment at ¶¶ 162, 166, 170, 172, 173, 177, 219, 221	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, allegedly an employee of the FBI. Contains statements about the preliminary stages of an investigation.
36	FBI Report, <i>Omar Al Bayoumi, Employed By Dallah Al Baraka</i> , April 15, 2002	Averment at ¶¶ 155, 158, 159, 161, 182, 184, 185, 188, 193, 195	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, allegedly an employee of the FBI. Contains statements about the preliminary stages of an investigation.

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37	U.S. Intelligence Report, <i>Connections of San Diego PENTTBOMB Subjects to the Government of Saudi Arabia</i> (Version #1).	Averment at ¶¶ 153, 158, 172, 177, 184, 189, 194, 195,197	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, allegedly an employee of an unidentified agency of the U.S. government. Contains statements about the preliminary stages of an investigation.
38	U.S. Intelligence Report, <i>Connections of San Diego PENTTBOMB Subjects to the Government of Saudi Arabia</i> (Version #2).	Averment at ¶¶ 153, 158, 172, 177, 184, 189, 194, 195,197	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, allegedly an employee of an unidentified agency of the U.S. government. Contains statements about the preliminary stages of an investigation.
39	U.S. Intelligence Report, <i>Connections of San Diego PENTTBOMB Subjects to the Government of Saudi Arabia</i> (Version #3).	Averment at ¶¶ 153, 158, 172, 177, 184, 189, 194, 195,197	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, allegedly an employee of an unidentified agency of the U.S. government. Contains statements about the preliminary stages of an investigation.
40	U.S. Department of Justice, Office of the Inspector General, <i>A Review of the FBI's Handling of Intelligence Information Related to the September 11 Attacks (November 2004)</i> , Released Publicly June 2006.	Averment at ¶¶ 160, 227	1, 3, 4, 6	Lengthy report which Plaintiffs cite for a description of a previous FBI investigation concerning Al Bayoumi, discussing statements of anonymous sources. Contains statements about the preliminary stages of an investigation.
41	Richard B. Schmitt and Josh Meyer, <i>9/11 Report: No Evidence of Critical Mistakes</i> , July 23, 2003.	Averment at ¶ 160	1, 3, 4, 6	Newspaper article discussing leaks about unreleased congressional report, which sources stated discussed a previous FBI investigation concerning Al Bayoumi. Contains statements about the preliminary stages of an investigation.
42	Shared Address for Omar al Bayoumi and Suleiman al Ali.	Averment at ¶ 167	1, 5	Document from an unidentified source (labeled "FOR INFORMATIONAL PURPOSES ONLY") purporting to list addresses and phone numbers.
43	Glenn R. Simpson, <i>Riyadh Paid Man Linked to Sept. 11 Hijackers</i> , Wall Street Journal, August 8, 2003.	Averment at ¶ 185	1, 3, 4, 6	Newspaper article. Contains statements about the preliminary stages of an investigation.
44	Pilip [sic] Shenon, <i>The Commission: The Uncensored History of the 9/11 Investigation</i> , pp. 185, 398, 399 (2008).	Averment at ¶¶ 191, 192, 201	1, 3, 4, 6	Popular history of the 9-11 investigation. Contains statements about the preliminary stages of an investigation.

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45	Excerpts from a FBI 302 Statement regarding Omar al Bayoumi and Mohdar Abdullah, January 15, 2002 and January 11, 2001.	Averment at ¶ 219	1, 3, 4, 5, 6	Partially redacted document by an unidentified author, allegedly an employee of the FBI.
46	FBI Report, <i>Mihdar Mohammad Al-Mihdar Zaid, A.K.A. Mohdar Mohamed Abdullah ; IT-UBL/AI QAIDA</i> , May 17, 2004.	Averment at ¶¶ 220, 223	1, 3, 4, 5, 6	Partially redacted document by an unidentified author, allegedly an employee of the FBI, relying on anonymous sources. Concerns the preliminary stages of an investigation.
47	FBI Report, <i>Mihdar Mohammad Al-Mihdar Zaid, A.K.A. Mohdar Mohamed Abdullah; IT-UBL/AI QAIDA</i> , May 18, 2004.	Averment at ¶¶ 220, 223	1, 3, 4, 5, 6	Partially redacted document by an unidentified author, purportedly an FBI employee, relying on anonymous sources. Concerns the preliminary stages of an investigation.
48	Lisa Myers and Jim Popkin, <i>Did The 9/11 Hijackers Have a U.S. Accomplice?</i> , NBC News, September 8, 2006.	Averment at ¶ 221	1, 3, 4, 6	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation.
49	FBI Report, <i>PENTTBOMB; Major Case 182</i> , October 3, 2001 (Version #1).	Averment at ¶¶ 150, 175, 177, 188, 194, 196, 197, 198, 206, 209	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
50	FBI Report, <i>PENTTBOMB; Major Case 182</i> , October 3, 2001 (Version #2).	Averment at ¶¶ 150, 175, 177, 188, 194, 196, 197, 198, 206, 209	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
51	FBI Report, <i>PENTTBOMB; Major Case 182</i> , October 3, 2001 (Version #3).	Averment at ¶¶ 150, 175, 177, 188, 194, 196, 197, 198, 206, 209	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
52	FBI 302 Statement Regarding Omar al Bayoumi, September 22, 2001.	Averment at ¶ 188	1, 3, 4, 5, 6	Partially redacted document by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation. States on its face that it contains "neither recommendations nor conclusions of the FBI."
53	<i>FBI Report Implicates Saudi Government in 9/11</i> , WashingtonsBlog, April 29, 2013.	Averment at ¶¶ 152, 162	1, 3, 4, 6	Blog post collecting statements from other blog posts and newspaper articles, several of which in turn rely on anonymous sources. Contains statements about the preliminary stages of an investigation.
54	FBI Report, <i>Anwar Nasser Aulaqi</i> , September 26, 2001 (Version #1).	Averment at ¶¶ 209, 212, 213, 215, 217, 218	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Contains statements about the preliminary stages of an investigation.

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55	FBI Report, <i>Anwar Nasser Aulaqi</i> , September 26, 2001 (Version #2).	Averment at ¶¶ 209, 212, 213, 215, 217, 218	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Contains statements about the preliminary stages of an investigation.
56	Susan Schmidt, <i>Imam From VA Mosque Now Thought to Have Aided Al Qaeda</i> , Washington Post, February 27, 2008.	Averment at ¶¶ 213, 214, 215, 216	1, 3, 4, 6	Newspaper article relying in part on anonymous sources. Contains statements about the preliminary stages of an investigation.
57	FBI Report, <i>PENTTBOMB</i> , September 26, 2001.	Averment at ¶¶ 217, 218	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
58	FBI Report, <i>Anwar Nasser Aulaqi, aka N.A. Aulaqi, Anwar N. Alaulaqi</i> , October 23, 2001.	Averment at ¶¶ 177, 209, 215	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
59	FBI 302 Statement Regarding Anwar Aulaqi Purchasing Airline Tickets for 9/11 Hijackers, September 27, 2001.	Averment at ¶ 218	1, 3, 4, 5, 6	Partially redacted document by an unidentified author, purportedly an FBI employee. Concerns the preliminary stages of an investigation. States on its face that it contains "neither recommendations nor conclusions of the FBI."
60	FBI Report, <i>Anwar Aulaqi</i> , May 9, 2002.	Averment at ¶¶ 209, 213, 217, 218	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
61	FBI Memorandum, <i>Abu Atiq Anwar Aulaqi</i> , December 1, 2006.	Averment at ¶¶ 173, 209, 215, 216, 219, 220	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
62	December 1, 2006 Letter from the U.S. Department of Justice to Yemen's Ministry of Interior, Re: Anwar Nasser Aulaqi, aka Anwar Al-Awlaki, Abu Atiq.	Averment at ¶¶ 209, 216	1, 4, 5, 6	Partially redacted letter by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
63	FBI Report, <i>PENTTBOMB</i> , April 11, 2002.	Averment at ¶¶ 219, 226	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
64	Susan Schmidt, <i>Spreading Saudi Fundamentalism in U.S.</i> , Washington Post, October 2, 2003.	Averment at ¶¶ 234, 236, 240, 462	1, 3, 4, 6	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation.

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65	David Rennie, <i>Hijackers in Same Hotel as Saudi Minister</i> , The Telegraph, October 3, 2003.	Averment at ¶¶ 234, 236, 237, 239, 240	1, 3, 4, 6	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation.
66	Dan Christensen and Anthony Summers, <i>FBI Records Say Sarasota Saudis Who Fled Home Had Many Connections to Individuals Tied to 9/11</i> , Broward Bulldog, April 16, 2013.	Averment at ¶¶ 249, 250, 251	1, 3, 4, 6	Online news article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation.
67	Dan Christensen and Anthony Summers, <i>New FBI Records: A Chilling Find in a Dumpster; 9/11 "Person of Interest" Re-Enters U.S.</i> , Broward Bulldog, July 1, 2014.	Averment at ¶¶ 249, 250, 251	1, 3, 4, 6	Online news article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation.
68	Dan Christensen, <i>9-11, Saudi Arabia and the Search for Answers Amid Government Secrecy</i> , Broward Bulldog, September 10, 2014.	Averment at ¶¶ 249, 250, 251	1, 3, 4, 6	Online news article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation.
69	FBI Report regarding Sarasota Saudi investigation, April 16, 2002.	Averment at ¶¶ 249, 250, 251	1, 3, 4, 5, 6	Partially redacted memorandum by an unidentified author, alleged to be an employee of the FBI. Concerns the preliminary stages of an investigation.
70	FBI Documents produced to Dan Christensen (Broward Bulldog) in response to a Freedom of Information Act ("FOIA") request concerning the Sarasota Saudi investigation, June 27, 2014.	Averment at ¶¶ 249, 250, 251	1, 3, 6	Collection of partially redacted memoranda by unidentified authors, apparently FBI employees. Concerns the preliminary stages of an investigation.
71	FBI Documents produced to Dan Christensen (Broward Bulldog) in response to a Freedom of Information Act ("FOIA") request concerning the Sarasota Saudi investigation, June 6, 2014.	Averment at ¶¶ 249, 250, 251	1, 3, 4, 6	Collection of partially redacted memoranda (some handwritten and illegible) by unidentified authors, apparently FBI employees. Concerns the preliminary stages of an investigation.
72	FBI Documents produced to Dan Christensen (Broward Bulldog) in response to a Freedom of Information Act ("FOIA") request concerning the Sarasota Saudi investigation, May 9, 2014.	Averment at ¶¶ 249, 250, 251	1, 6	Collection of partially redacted memoranda by unidentified authors, apparently FBI employees. Concerns the preliminary stages of an investigation.
73	FBI Documents produced to Dan Christensen (Broward Bulldog) in response to a Freedom of Information Act ("FOIA") request concerning the Sarasota Saudi investigation, March 28, 2014.	Averment at ¶¶ 249, 250, 251	1, 3, 4, 6	Collection of partially redacted memoranda by unidentified authors, apparently FBI employees. Concerns the preliminary stages of an investigation.

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74	9/11 Commission Memorandum for the Record, Interview of Muhammad Jabber Hassan Fakihi, October 20-21, 2003.	Averment at ¶¶ 254, 255, 263	1, 3, 7, 8	Memorandum summarizing statements made during investigative interview. Concerns alleged indirect transfers of funds outside the United States to charities with alleged links to terrorism.
75	David Crawford, <i>How a Diplomat From Saudi Arabia Spread His Faith</i> , Wall Street Journal, September 10, 2003.	Averment at ¶¶ 254-258, 260, 262, 504	1, 3, 4, 6, 7, 8	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation. Concerns alleged indirect transfers of funds outside the United States to charities with alleged links to terrorism.
76	Newsweek Staff, <i>Saudi Government: Bin Laden Loyalists: How High Do They Go?</i> , Newsweek, May 4, 2003.	Averment at ¶¶ 258, 261, 262	1, 3, 4, 6, 7, 8	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation. Concerns alleged indirect transfers of funds outside the United States to charities with alleged links to terrorism.
77	Stefan Theil, <i>The Saudis: A Missing Diplomat?</i> , Newsweek, March 13, [2003].	Averment at ¶ 259	1, 3, 4, 6, 7, 8	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation. Concerns alleged indirect transfers of funds outside the United States to charities with alleged links to terrorism.
78	Matt Levitt, <i>Drawing a Line in the Saudi Sand</i> , National Review Online, April 16, 2003.	Averment at ¶¶ 260, 262	1, 3, 6, 7, 8	Magazine article or opinion piece. Concerns the preliminary stages of an investigation. Concerns alleged indirect transfers of funds outside the United States to charities with alleged links to terrorism.
79	Matt Levitt, <i>Subversion From Within: Saudi Funding of Islamic Extremist Groups in the United States</i> , Policy Watch, October 2, 2003.	Averment at ¶¶ 259, 261	1, 2, 3, 4, 6, 7, 8	Edited version of legislative testimony, republished as a "special report" in a magazine. To whatever extent it is testimonial, not based on personal knowledge. Concerns the preliminary stages of an investigation. Concerns alleged transfers of funds outside the United States to charities with alleged links to terrorism, and general efforts to prevent indirect funding of terrorism outside the United States.
80	Susan Schmidt and Caryle Murphy, <i>U.S. Revokes Visas of Cleric at Saudi Embassy, Monarchy to No Longer Be Islamic Institute's Sponsor</i> , Washington Post, December 7, 2003.	Averment at ¶¶ 265-169 [sic], 271	1, 3, 4	Newspaper article, relying in part on anonymous sources.
81	Staff, <i>Islamic Institute Closed, Searched</i> , Washington Times, July 1, 2004.	Averment at ¶¶ 265-169 [sic], 271	1, 3, 4, 6	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation.

1. Unsworn hearsay

2. Hearsay without cross-examination

3. Hearsay within hearsay

4. Lack of personal knowledge

5. Unauthenticated

6. Preliminary investigative stages

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
82	Letter from Senator Charles Schumer to the Honorable Colin L. Powell, January 29, 2004.	Averment at ¶ 270	1, 3, 4	Letter referring to statements by anonymous sources.
83	Official Press Release from the Office of Senator Chuck Schumer, <i>Schumer: Yesterday's State Department Move to Revoke Visas of Saudis Linked to Wahhabism Doesn't Go Far Enough</i> , January 29, 2004.	Averment at ¶ 270	1, 3, 4	Press release quoting Exh. 82.
84	Official Press Release from the Office of Senator Chuck Schumer, <i>Schumer, Collins Urge State Dept to Add Saudi Arabia to List of Religiously Intolerant Nations</i> , August 9, 2004.	Averment at ¶ 272	1, 3, 4, 8	Press release. Concerns alleged transfers of funds to charities.
85	Diplomatic Cable, <i>Islamic Extremism in the Netherlands</i> , October 6, 2005.	Averment at ¶¶ 273, 274, 275	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged transfers of funds outside the United States to charities with alleged links to terrorism.
86	Beatrice de Graaf, <i>The Nexus Between Salafism and Jihadism in the Netherlands</i> , CTC Sentinel, March 3, 2010.	Averment at ¶¶ 275, 276	1, 3, 4, 7, 8	Newsletter or journal article. Concerns alleged transfers of funds outside the United States from charities to groups or individuals who allegedly committed terrorist acts.
87	Diplomatic Cable, U.S. Embassy The Hague, <i>Radical Imams Expelled From the Netherlands</i> , February 17, 2006.	Averment at ¶¶ 281, 282	1, 3, 4, 5, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged advocacy of extremist activities occurring outside the United States.
88	Ian Johnson and David Crawford, <i>A Saudi Group Spreads Extremism in 'Law' Seminars, Taught in Dutch</i> , Wall Street Journal, April 15, 2003.	Averment at ¶¶ 277, 278, 279, 280	1, 3, 4, 6, 7, 8	Newspaper article, relying in part on anonymous sources. Concerns the preliminary stages of an investigation. Concerns alleged indirect transfers of funds outside the United States to charities with alleged links to terrorism.
89	Expatica.com, <i>Dutch Expel Fourth Imam in Anti-Terror Offensive, AIVD Keeps Watch on Six Suspicious Islamic Groups</i> , February 24, 2005.	Averment at ¶¶ 273, 274, 283	1, 3, 4, 6, 7, 8	Blog or online news post, relying in part on anonymous sources. Concerns the preliminary stages of an investigation. Concerns alleged advocacy of extremist activities occurring outside the United States.
90	Robert Spencer, <i>Dutch Expel Fourth Imam in Anti-Terror Offensive</i> , Jihad Watch, February 25, 2005.	Averment at ¶ 283	1, 3, 4, 7, 8	Blog post, quoting blog or online news post, in turn relying in part on anonymous sources. Concerns alleged advocacy of extremist activities occurring outside the United States.

1. Unsworn hearsay

2. Hearsay without cross-examination

3. Hearsay within hearsay

4. Lack of personal knowledge

5. Unauthenticated

6. Preliminary investigative stages

7. Events outside the United States

8. Allegations of indirect funding

Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
91	Diplomatic Cable, U.S. Embassy Riyadh, <i>Scenesetter for APHSCT Townsend Visit to Saudi Arabia, 5-8 February 2007</i> , February 1, 2007.	Averment at ¶ 285	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website cables.mrkva.eu. Concerns topics including prevention of indirect funding for terrorist activities and alleged advocacy of extremist activities, all occurring outside the United States.
92	Diplomatic Cable, U.S. Embassy Riyadh, <i>Confronting Intolerance in Saudi Mosques</i> , February 10, 2008.	Averment at ¶ 285	1, 3, 4, 5, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website cables.mrkva.eu. Concerns topics including prevention of indirect funding for terrorist activities and alleged advocacy of extremist activities.
93	Al-Sirat Al-Mustaqeem, Interview with Sheikh al Mujahideen Abu Abdel Aziz, August 1994.	Averment at ¶¶ 292, 293	1, 5, 7, 8	Transcript of a translated interview, apparently obtained from the site "deeppoliticsforum.com." The translation is neither authenticated nor certified. Concerns indirect funding of terrorist activities outside the United States.
94	Ministry of the Interior and Kingdom Relations, General Intelligence and Security Service, <i>From Dawa to Jihad: The Various Threats From Radical Islam to the Democratic Legal Order</i> , December 2004.	Averment at ¶ 314	1, 3, 4, 7	Policy paper. Concerns topics including alleged advocacy of extremist activities, all occurring outside the United States.
95	1996 Central Intelligence Agency Report.	Averment at ¶¶ 315, 382, 507	1, 3, 4, 5, 8	Untitled document by unidentified author, allegedly attributable to the CIA. Concerns alleged links between charity organizations and terrorist activities. See Reply 12 n.20.
96	Money Laundering and Terror Financing Issues in the Middle East, Hearing Before the U.S. Senate Committee on Banking, Housing, and Urban Affairs (July 13, 2005), Testimony of Treasury Department Undersecretary for Terrorism and Financial Intelligence Stuart A. Levey, and Dennis M. Lormel.	Averment at ¶¶ 316, 472	2, 4, 8	Written legislative testimony. Concerns alleged indirect funding of terrorist activities and the prevention of such funding.
97	<i>Saudi Arabia: Friend or Foe in the War on Terror</i> , Hearing Before the U.S. Senate Judiciary Committee (November 8, 2005), Statement of Senator Patrick J. Leahy.	Averment at ¶ 316	1, 3, 4, 8	Statement at hearing by legislator. Concerns the prevention of indirect funding of terrorist activities.

1. Unsworn hearsay

2. Hearsay without cross-examination

3. Hearsay within hearsay

4. Lack of personal knowledge

5. Unauthenticated

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
98	<i>Saudi Arabia: Friend or Foe in the War on Terror</i> , Hearing Before the U.S. Senate Judiciary Committee (November 8, 2005), Statement of Senator Russell D. Feingold.	Averment at ¶ 316	1, 4, 8	Statement at hearing by legislator. Concerns the prevention of indirect funding of terrorist activities.
99	<i>Saudi Arabia: Friend or Foe in the War on Terror</i> , Hearing Before the U.S. Senate Judiciary Committee (November 8, 2005), Statement of Senator Arlen Specter.	Averment at ¶ 316	1, 4, 8	Statement at hearing by legislator. Concerns the prevention of indirect funding of terrorist activities.
100	Terrorism Financing: Origination, Organization, and Prevention, Hearing Before the U.S. Senate Committee on Governmental Affairs (July 31, 2003), Statements of Senator Susan M. Collins and Senator Carl M. Levin, and Prepared Testimony of Steven Emerson and Jonathan Levin.	Averment at ¶¶ 316, 407	1, 2, 3, 4, 8	Includes both statements at hearing by legislators and oral and written legislative testimony. Generally concerns alleged indirect funding of terrorist activities and the prevention of such funding.
101	Terrorism: Two Years After 9/11, Connecting the Dots, Hearing Before the U.S. Senate Judiciary Subcommittee on Terrorism, Technology and Homeland Security (September 10, 2003), Statement of Senator Jon Kyl and Testimony of Simon Henderson and Matthew Epstein.	Averment at ¶ 316	1, 2, 3, 4, 8	Includes both statements at hearing by legislators and oral and written legislative testimony. Generally concerns alleged indirect funding of terrorist activities and the prevention of such funding.
102	<i>Efforts to Combat Terrorism Financing</i> , Hearing Before the U.S. Senate Committee on Banking, Housing and Urban Affairs (September 25, 2003), Testimony of former Treasury Department General Counsel David D. Aufhauser.	Averment at ¶ 316	2, 4, 8	Written legislative testimony. Concerns alleged indirect funding of terrorist activities and the prevention of such funding.
103	<i>An Assessment of Current Events to Combat Terrorism Financing</i> , Hearing Before the U.S. Senate Committee on Governmental Affairs (June 15, 2004), Statements of Senator Carl M. Levin and Lee S. Wolosky.	Averment at ¶ 316	1, 2, 3, 4, 8	Includes both statements at hearing by legislators and oral and written legislative testimony. Generally concerns alleged indirect funding of terrorist activities and the prevention of such funding.

1. Unsworn hearsay  
2. Hearsay without cross-examination  
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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
104	Diplomatic Cable, U.S. Embassy Riyadh, <i>Scenesetter for Special Representative Ambassador Holbrooke's February 15-16 Visit to Riyadh</i> , February 12, 2010.	Averment at ¶ 318	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged indirect funding of terrorist activities and the prevention of such funding, all outside the United States.
105	Diplomatic Cable, Secretary of State Hillary Clinton, <i>Terrorist Finance: Action Request for Senior Level Engagement on Terrorism Finance</i> , December 30, 2009.	Averment at ¶¶ 319, 369	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and published by the New York Times. Concerns alleged indirect funding of terrorist activities and the prevention of such funding, all outside the United States.
106	Diplomatic Cable, U.S. Embassy Khartoum, <i>Southern Sudan Security Environment Profile Questionnaire (SEPQ)</i> , April 1, 2009.	Averment at ¶ 320	1, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
107	Diplomatic Cable, U.S. Embassy Riyadh, <i>Saudi Ministry of the Interior on Terrorist Financing Issues</i> , March 25, 2009.	Averment at ¶ 321	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged indirect funding of terrorist activities and the prevention of such funding, all outside the United States.
108	Diplomatic Cable, U.S. Embassy Kampala, <i>2008 Security Environment Profile Questionnaire (SEPQ)</i> , Kampala, March 12, 2009.	Averment at ¶ 322	1, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
109	Diplomatic Cable, U.S. Embassy Sana'a, <i>Sanaa Security Environment Profile Questionnaire (SEPQ)- Spring 2009</i> , March 2, 2009.	Averment at ¶ 323	1, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
110	Diplomatic Cable, U.S. Embassy Jakarta, <i>Radical Muslim Group Stages Congress</i> , August 21, 2008.	Averment at ¶ 324	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
111	Diplomatic Cable, Secretary of State, <i>Reporting and Collection Needs: Paraguay</i> , March 24, 2008.	Averment at ¶ 325	1, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.

1. Unsworn hearsay

2. Hearsay without cross-examination

3. Hearsay within hearsay

4. Lack of personal knowledge

5. Unauthenticated

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
112	Diplomatic Cable, U.S. Embassy Khartoum, <i>Terrorist Finance: Post-Vetting of Human Appeal International (HAI)</i> , February 13, 2007.	Averment at ¶ 326	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
113	Diplomatic Cable, Secretary of State, <i>Terrorism Finance: International Islamic Relief Organization (IIRO)</i> , June 16, 2006	Averment at ¶ 327	1, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
114	Diplomatic Cable, U.S. Embassy Sofia, <i>Islam and Islamic Extremism in Bulgaria</i> , October 11, 2005.	Averment at ¶ 328	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
115	Diplomatic Cable, U.S. Embassy Manila, <i>Islamic NGOs in the Philippines</i> , May 23, 2005.	Averment at ¶¶ 329, 395	1, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged links between certain charities and terrorist organizations outside the United States.
116	Diplomatic Cable, Secretary of State, <i>Terrorist Finance: [REDACTED]</i> , June 2004.	Averment at ¶¶ 330, 394	1, 3, 4, 7, 8	Partially redacted cable, allegedly from US diplomatic sources. Concerns alleged links between certain charities and terrorist organizations outside the United States.
117	Diplomatic Cable, Secretary of State, <i>Terrorist Financing - [REDACTED] IIRO</i> , April 2004.	Averment at ¶¶ 331, 393	1, 3, 4, 7, 8	Partially redacted cable, allegedly from US diplomatic sources. Concerns alleged links between certain charities and terrorist organizations outside the United States.
118	Declaration of Ali Muhammad al Kamal, Manager for the Financial Affairs Administration of the Muslim World League.	Averment at ¶ 336	2, 7, 8	Translated version of affidavit. Concerns transfers of funds to charities outside the United States.
119	Declaration of Abdulaziz H. al Fahad, Member of the Council of Ministers.	Averment at ¶ 337	2, 7, 8	Affidavit. Concerns relationship between the Kingdom and charities outside the United States. (For the record, Mr. al Fahad is not a "Member of the Council of Ministers," as Plaintiffs assert. That would make him a senior government official. He is instead an attorney in private practice who serves on an advisory committee that assists the Council with translating legal documents. See Exh. 119, para. 2-3.)

1. Unsworn hearsay

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
120	Declaration of Abdullah bin Saleh al Obaid, former Secretary General of the Muslim World League.	Averment at ¶ 338	2, 7, 8	Affidavit. Concerns relationship between the Kingdom and charities outside the United States.
121	The Muslim World League Journal, Vol. 11, Nos. 5 & 6, February-March 1984.	Averment at ¶ 339	1, 7, 8	Journal article. Concerns activities of charities outside the United States.
122	<i>Minister of Citizenship and Immigration v. Mahmoud Jaballah</i> , Federal Court of Canada, Docket DES-6-99, November 2, 1999.	Averment at ¶¶ 340, 423, 442	2, 6, 7, 8	Quotation from trial testimony. Concerns activities of charities outside the United States. Refers to preliminary accusations (later found to be unsupported by the evidence; see Exh. 122, ¶ 138).
123	Defendant Muslim World League's Answer to First Amended Complaint, <i>In Re: Terrorist Attacks on September 11, 2001</i> , MDL Case No. 1:03-md-01570, ECF No. 346, July 30, 2004.	Averment at ¶ 341	4, 8	Allegation of counsel made after reasonable investigation but without basis in personal knowledge. Concerns relationship between the Kingdom and a charity.
124	U.S. Treasury Department Statement on the Designation of Wa'el Hamza Julidan, September 6, 2002.	Averment at ¶¶ 342, 551, 564	1, 3, 4	Press release.
125	"Tareekh Osama" (or "Osama's History") files.	Averment at ¶¶ 344, 345, 348, 349, 549, 550, 564.	1, 3, 4, 5, 7, 8	Collection of documents, some handwritten, with translation interspersed. Neither the author nor the translator are identified; neither the letter nor the translation are authenticated; and the translation is not certified. Concerns alleged assistance to terrorists from charities outside the United States.
126	Statement of Abdullah al Hashayka, December 24, 1994.	Averment at ¶¶ 351, 352	2, 7, 8	Translated excerpt of apparent trial testimony. Concerns alleged links to terrorism by a former charity official, related to activities outside the United States.
127	Mohammed Jamal Khalifa arrest records ("Known Terrorist"), December 16, 1994.	Averment at ¶¶ 353, 383	6	Arrest records. Documents a preliminary accusation.
128	Dar al Imam al Shafi'i Terrorism Curriculum.	Averment at ¶¶ 353, 384	1, 3, 4, 5, 7, 8	Purported translation or summary from a handwritten Arabic document. The author of the underlying document is not identified; neither the document nor the translation are authenticated; and the translation is not certified. Concerns alleged terrorist activities outside the United States by a former charity official.

1. Unsworn hearsay  
2. Hearsay without cross-examination  
3. Hearsay within hearsay

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
129	Declaration in Support of Pre-Trial Detention, <i>U.S. v. Soliman S. Biheiri</i> , Case No. 03-365-A, August 14, 2003.	Averment at ¶ 362	2, 3, 4, 8	Declaration. Concerns alleged transfers of funds from charities to terrorist organizations.
130	Diplomatic Cable, U.S. Embassy Madrid, <i>DOJ Counterterrorism Meetings With Spanish Authorities</i> , June 1, 2005.	Averment at ¶ 364	1, 3, 4, 5, 6, 7, 8	Part of a cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns the preliminary stages of an investigation. Concerns alleged transfers of funds from a charity to terrorists outside the United States.
131	Nick Wood, <i>US Fears Terrorist Attack in Kosovo</i> , BBC News, April 3, 2000.	Averment at ¶¶ 366, 551, 565, 566	1, 3, 4, 6, 7, 8	Online news article. Concerns the preliminary stages of an investigation. Concerns alleged transfers of funds from a charity to terrorists outside the United States.
132	Excerpt from the Muslim World League magazine, Interview with Dr. Abdullah bin Saleh al Obaid, July 21-27, 1997.	Averment at ¶¶ 368, 563	1, 3, 7, 8	Magazine excerpt. Concerns alleged transfers of funds from a charity to terrorists outside the United States.
133	Defendant International Islamic Relief Organization's Amended Answer to First Amended Complaint, <i>In Re: Terrorist Attacks on September 11, 2001</i> , MDL Case No. 1:03-md- 01570, ECF No. 1548, December 13, 2005.	Averment at ¶ 372	4, 8	Allegation of counsel made after reasonable investigation but without basis in personal knowledge. Concerns relationship between the Kingdom and a charity.
134	March 16, 1999 Memorandum from Secretary-General Dr. Adnan Khalil Basha to the managers of all the overseas branch offices of the International Islamic Relief Organization.	Averment at ¶ 372	5, 8	Translation of internal charity memorandum. The translator is not identified, and the translation is not authenticated. Concerns the relationship between the Kingdom and a charity.
135	Declaration of Saleh Abdullah al Saykhan, Manager of the Financial Administration of the International Islamic Relief Organization.	Averment at ¶ 373	2, 7, 8	Translated version of affidavit. Concerns transfers of funds to charities outside the United States.
136	2000-2001 Annual Report of the International Islamic Relief Organization.	Averment at ¶ 374	1, 7, 8	Annual report of charity. Concerns the relationship between the Kingdom and a charity, and the charity's activities outside the United States.
137	Center for Contemporary Conflict, <i>Al Qaeda Finances and Funding to Affiliated Groups</i> , January 2005.	Averment at ¶¶ 376, 380, 382, 419	1, 3, 4, 7, 8	Journal article. Concerns transfers of funds to charities outside the United States.

1. Unsworn hearsay
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3. Hearsay within hearsay

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
138	Government's Evidentiary Proffer Supporting the Admissibility of Coconspirator Statements, United States v. Enaam Arnaout, United States District Court for the Northern District of Illinois, Case No. 02-CR-892, January 6, 2003 [By way of background, Usama Bin Laden and Abdallah Azzam formed Mekhtab al Khidemat ("MK") (the "Office of Services") to support mujahideen in Afghanistan engaged in a conflict with the Soviet Union at a time prior to the Soviet withdrawal in 1989. Various relief organizations - including LBI, the BIF forerunner - worked with MK to provide travel documents, funds and other logistical support to the mujahideen. MK also worked with a number of other charitable/relief organizations, especially with Wael Julaidan ("Abu Hassan al Madani") of the International Islamic Relief Organization (hereafter "IIRO", sometimes referred to as "Igatha" based upon its Arabic name "Hay' at allgatha al-Islamiya al 'Alamiyaa"), which was under the umbrella of al Rabita al Alami al Islamiya, also known as the Muslim World League ("MWL"). In many respects, Wael Julaidan was a leading supporter of the jihad through the relief organization network. Persons affiliated with charities provided logistical support to the mujahideen so integral to the success of the mujahideen that, as discussed below, Julaidan was featured in organizational charts as the person responsible for "Jihad Support," even dating to the time prior to the forming of al Qaeda.]	Averment at ¶ 376	1, 3, 4, 7, 8	Evidentiary proffer submitted by the government in a case against a former charity employee. Concerns activities by a charity or charity employees outside the United States. The lengthy statement quoted in Plaintiffs' Description does not appear to be attributed to any particular source or witness with personal knowledge.
139	FBI 302 Cooperating Witness Statements of Jamal al Fadl, November 1996.	Averment at ¶¶ 377, 385	1, 3, 4, 5, 6, 7, 8	Memorandum by an unnamed author, alleged to be an employee of the FBI, paraphrasing witness statements. Material from the preliminary stages of an investigation. Concerns alleged assistance provided by a charity official to terrorists outside the United States.

1. Unsworn hearsay  
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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
140	FBI 302 Cooperating Witness Interview of Jamal al Fadl, June 2, 2004.	Averment at ¶ 377	1, 3, 4, 5, 6, 7, 8	Memorandum by an unnamed author, alleged to be an employee of the FBI, summarizing statements of an unnamed witness, alleged to be Jamal al Fadl. Material from the preliminary stages of an investigation. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
141	Transcript Excerpts from Videotape Interviews of Jamal al Fadl, submitted as evidence in United States v. Fazul Abdullah Mohammed, et al., Case No. 01-1535-cr(L), United States Second Circuit Court of Appeals, filed June 14, 2007, pp. SA-894-901 [Former al Qaeda member Jamal al Fadl told U.S. authorities that Jelaidan ran the IIRO office in Peshawar, Pakistan which was responsible for providing International Islamic Relief Organization identification cards to al Qaeda and other mujahideen in order to get them across the Pakistan-Afghanistan border.].	Averment at ¶ 377	1, 5, 7, 8	Transcript of a witness interview by unnamed individuals, alleged to be employees of the U.S. government. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
142	FBI 302 Cooperating Witness Statements of Jamal al Fadl, January-February 1998.	Averment at ¶ 378	1, 3, 4, 5, 6, 7, 8	Memorandum by an unnamed author, alleged to be an employee of the FBI, paraphrasing statements of an unnamed witness. Material from the preliminary stages of an investigation. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
143	<i>The Evolution of Terrorist Financing in the Philippines</i> , PCSUPT Rodolfo B. Mendoza, Jr., Philippine National Police.	Averment at ¶¶ 380, 381	1, 3, 4, 6, 7, 8	Powerpoint presentation. Concerns alleged transfers of funds from charities to terrorists outside the United States.
144	U.S. Treasury Department Executive Order 13224 Designation Memorandum for Dr. Abd al Hamid Sulaiman al Mujil and the International Islamic Relief Organization's Philippines and Indonesia Branches.	Averment at ¶ 381	1, 3, 4, 5, 6, 7, 8	Memorandum from Treasury Department designating various persons as having supported terrorism. Concerns alleged transfers of funds and other assistance from charities to terrorists outside the United States.

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
145	December 16, 1994 letter authored by Philip C. Wilcox, Jr., U.S. Department of State's Coordinator for Counterterrorism.	Averment at ¶ 386	1, 3, 4, 6, 7, 8	Letter to Immigration Judge concerning preliminary accusations in various proceedings. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
146	December 20, 1994 letter authored by Philip C. Wilcox, Jr., U.S. Department of State's Coordinator for Counterterrorism.	Averment at ¶ 387	1, 3, 4, 6, 7, 8	Letter to Immigration Judge concerning statements by unidentified sources and preliminary accusations in various proceedings. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
147	Diplomatic Cable, Secretary of State, <i>Arrest in US of Terrorist Financier Muhammad Khalifah Now Under Indictment in Jordan</i> , December 1994.	Averment at ¶ 389	1, 3, 4, 6, 7, 8	Partially redacted diplomatic cable. Concerns preliminary accusations in various proceedings. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
148	Diplomatic Cable, Secretary of State, <i>Official-Informal</i> , December 1994.	Averment at ¶ 389	1, 3, 4, 6, 7, 8	Partially redacted diplomatic cable. Concerns preliminary accusations in various proceedings. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
149	Diplomatic Cable, U.S. Embassy Manila, <i>Who Was Behind IPIL? No Shortage of Suspects</i> , April 1995.	Averment at ¶ 390	1, 3, 4, 7	Partially redacted diplomatic cable. Concerns terrorist activities outside the United States.
150	Diplomatic Cable, Secretary of State, <i>September 11: Working Together to Fight the Plague of Global Terrorism and the Case Against Al-Qa'ida</i> , October 2001.	Averment at ¶ 392	1, 3, 4, 7, 8	Diplomatic cable. Concerns alleged assistance provided by a charity official to terrorists outside the United States.
151	Diplomatic Cable, Secretary of State, <i>Terrorist Finance: [REDACTED]</i> , June 2004.	Averment at ¶ 394	1, 3, 4, 7, 8	Partially redacted diplomatic cable. Concerns alleged assistance provided by a charity to terrorists outside the United States.
152	September 1, 2003 letter from Mohammed Jamal Khalifa to Dr. Adnan bin Khalil Basha.	Averment at ¶ 396	1, 5, 7, 8	Letter in Arabic with uncertified translation by unidentified translator. Concerns alleged relationship between the Kingdom and a charity branch office outside the United States.
153	Diplomatic Cable, U.S. Embassy Manama, <i>OFAC Director Werner's Meetings With Finance Minister, Minister of Social Affairs, Central Bank Governor</i> , October 3, 2005.	Averment at ¶ 397	1, 3, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged transfers of funds by a charity outside the United States.

1. Unsworn hearsay
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154	Diplomatic Cable, U.S. Embassy Manama, <i>Treasury Undersecretary Stuart Levey Visits Bahrain to Discuss AML/CFT Efforts</i> , February 20, 2006.	Averment at ¶ 397	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged transfers of funds by a charity outside the United States.
155	Diplomatic Cable, U.S. Consulate Jeddah, <i>IIRO Secretary-General Talks of Saudi Programs and Expansions</i> , October 9, 2006.	Averment at ¶ 398	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged advocacy of extremist activities occurring at charity events outside the United States.
156	Diplomatic Cable, U.S. Embassy Khartoum, <i>Terrorist Finance: Post-Vetting of Human Appeal International (HAI)</i> , February 13, 2007.	Averment at ¶ 399	1, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged assistance provided by a charity to terrorists outside the United States.
157	Diplomatic Cable, U.S. Embassy Riyadh, <i>APHSCT Townsend February 6 Meeting With Foreign Minister Prince Saud Al-Faisal</i> , February 24, 2007.	Averment at ¶ 400	1, 3, 4, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged assistance provided to terrorists outside the United States.
158	Diplomatic Cable, U.S. Embassy Skopje, <i>Macedonia: A/S O'Brien Visit Highlights Terrorism Financing Issues</i> , August 22, 2007.	Averment at ¶ 401	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged funding or assistance provided to terrorists by a charity outside the United States.
159	Diplomatic Cable, U.S. Embassy Dhaka, <i>International Islamic Relief Organization (IIRO) Seeks to Access Funds Frozen by Islami Bank Bangladesh</i> , November 3, 2008.	Averment at ¶ 402	1, 3, 4, 5, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged transfers of funds from a charity outside the United States to terrorists.
160	U.S. Treasury Department Designates Director, Branches of Charity Bankrolling Al Qaida Network, August 3, 2006.	Averment at ¶¶ 403, 404	1, 4, 7, 8	Press release. Concerns alleged transfers of funds from a charity outside the United States to terrorists.
161	Diplomatic Cable, U.S. Embassy Riyadh, <i>Terrorism Finance: Saudi Response of IIRO's Al-Mua'jjil UNSCR 1267 Designation</i> , August 14, 2006.	Averment at ¶ 405	1, 3, 4, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns prevention of alleged transfers of funds from a charity outside the United States to terrorists.
162	Diplomatic Cable, U.S. Embassy Riyadh, <i>Scenesetter: APHSCT Townsend Visit to Saudi Arabia, 4-7 November 2006</i> , October 24, 2006.	Averment at ¶ 405	1, 4, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns prevention of alleged transfers of funds from a charity outside the United States to terrorists.

1. Unsworn hearsay

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163	Diplomatic Cable, U.S. Consulate Jeddah, <i>International Islamic Relief Organization - Designated by UN 1267 and US Treasury - Issues Letter of Congratulations to President Obama</i> , March 2, 2009.	Averment at ¶ 406	1, 4, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged transfers of funds from a charity outside the United States to terrorists.
164	Affirmation of Evan F. Kohlman, <i>In Re: Terrorist Attacks on September 11, 2001</i> , MDL Case No. 1:03-md-01570, April 22, 2010.	Averment at ¶¶ 408-418, 531	2, 3, 4, 6, 7, 8	Affirmation of purported expert, consisting primarily of recitation of secondary evidence. Inadmissible for substantially the same reasons as Kohlmann's other affirmation. See Reply 15-16 & n.29. Concerns preliminary accusations in other proceedings. Concerns alleged participation by charity officials in terrorist or terrorism-related activities outside the United States.
165	Associated Press, <i>Pakistan Deporting 89 Arab Aid Workers</i> , October 6, 2001.	Averment at ¶¶ 420, 554	1, 3, 4, 7, 8	News article from website. Concerns alleged transfers of funds from charities to terrorist organizations outside the United States.
166	International Islamic Relief Organization Pakistan Branch, Verification of Receipts and Payments for the Period From January 1, 1996 to February 22, 2001, Ford Rhodes Sidat Hyder & Co. Chartered Accountants (A Member of Ernst & Young International) [The "audit" of the IIRO-Pakistan branch, dated just a few months before the September 11th attacks, uncovered the apparent diversion of millions of dollars of funds by that branch, and the wholesale fabrication of invoices, receipts and entire projects to conceal that activity. This is the same branch office that was used by the IIRO to fund 6 al Qaeda training camps, according to the 1996 CIA Report at Exhibit 95.].	Averment at ¶ 420	1, 3, 4, 7, 8	Report by external accountant. Concerns alleged misappropriation of funds at a charity office outside the United States. Plaintiffs' bracketed characterization is not from personal knowledge and also misstates the contents of Exhibit 95. See Reply 12 n.20.

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167	<i>Investigating Patterns of Terrorism Financing</i> , Hearing Before the U.S. House Committee on Financial Services Subcommittee on Oversight and Investigations (February 12, 2002), Testimony of Steven Emerson.	Averment at ¶ 423	2, 3, 4, 6, 7	Written legislative testimony. Concerns a preliminary accusation in another proceeding. Concerns alleged indirect funding of terrorist activities and the prevention of such funding.
168	U.S. Department of Defense, JTF-GTMO Matrix of Threat Indicators for Enemy Combatants.	Averment at ¶ 427	1, 4, 6, 7	Document apparently prepared for assessing detainees at Guantanamo Bay facility. Concerns preliminary accusations in another proceeding. Concerns alleged support by charities for terrorist activities outside the United States. States expressly (at 1) that the factors it contains should "not [be used] as evidence to prove a detainee's guilt or innocence," much less that of third parties. (Emphasis omitted.)
169	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Samir N. al Hasan (ISN No. 043), October 13, 2006, March 4, 2008.	Averment at ¶¶ 427, 428	1, 3, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged financial links between a charity and a terrorist organization, outside the United States.
170	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Rashed Awad Khalaf Balkhair (ISN No. 186), May 27, 2005, June 28, 2006.	Averment at ¶ 429	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged association between an employee of a charity and terrorist organizations outside the United States.
171	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Said Muhammad Husayn Qahtani (ISN No. 200), September 21, 2004, July 1, 2005, August 12, 2006, January 5, 2009.	Averment at ¶¶ 430, 512	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged contacts with charities outside the United States by an individual linked to terrorist organizations.
172	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdallah Ibrahim al Rushaydan (ISN No. 343), September 10, 2004, April 12, 2005, April 19, 2005.	Averment at ¶¶ 431, 432	1, 3, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged contacts with charities outside the United States by an individual linked to terrorist organizations.

1. Unsworn hearsay

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
173	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Rashid Abd al Muslih Qaida al Qaid (ISN No. 344), September 30, 2004, May 13, 2005, June 24, 2005.	Averment at ¶ 433	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged contacts with charities outside the United States by an individual linked to terrorist organizations.
174	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Ghanim Abd al Rahman Ghanim al Huwaymadi al Harbi (ISN No. 516), October 25, 2005, June 23, 2006, June 5, 2007.	Averment at ¶ 434	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged former charity employee with links to terrorist organizations.
175	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Tariq Mahmoud Ahmed al Sawah (ISN No. 535), January 16, 2008, September 30, 2008.	Averment at ¶¶ 435, 436	1, 3, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a former charity employee.
176	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Ahmed Hassan Jamil Suleyman (ISN No. 662), June 18, 2004, March 28, 2005.	Averment at ¶ 437	1, 3, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a former charity volunteer.
177	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdul Latif Elbanna (ISN No. 905), May 15, 2005, August 26, 2005.	Averment at ¶ 438	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a former charity employee.
178	Declaration of Mutaz Saleh Abu Unuq, Financial Director of the World Assembly of Muslim Youth, April 7, 2003.	Averment at ¶ 441	2, 7, 8	Declaration. Concerns relationship between the Kingdom and a charity outside the United States, and transfers of funds occurring outside the United States.
179	<i>Saudi Arabia: Friend or Foe in the War on Terror</i> , Hearing Before the U.S. Senate Judiciary Committee (November 8, 2005), Testimony of Steven Emerson.	Averment at ¶ 442	2, 3, 4, 7	Written legislative testimony. Lacks a basis in personal knowledge. Concerns relationship between the Kingdom and charities outside the United States.

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180	<i>Terrorism Financing: Origination, Organization, and Prevention</i> , Hearing Before the U.S. Senate Committee on Governmental Affairs (July 31, 2003), Prepared Testimony of Steven Emerson and Jonathan Levin.	Averment at ¶¶ 445, 464, 533, 553	2, 3, 4, 7, 8	Written legislative testimony. Lacks a basis in personal knowledge. Concerns preliminary accusations in another proceeding, alleged advocacy of extremist activities, alleged transfers of funds from charities to organizations with terrorist links outside the United States, and alleged terrorist acts by charity employees; all outside the United States.
181	<i>Persecution of Christians Worldwide</i> , Hearing Before the U.S. House Subcommittee on International Operations and Human Rights (February 15, 1996), Written Statement of James B. Jacobson.	Averment at ¶ 446	2, 3, 4, 7	Written legislative testimony. Lacks a basis in personal knowledge. Concerns alleged advocacy of extremist activities outside the United States.
182	World Assembly of Muslim Youth, <i>Islamic Camps: Objectives, Program Outlines, Preparatory Steps</i> .	Averment at ¶ 446	n/a	Undated pamphlet containing religious songs. Does not fit the listed categories, but is immaterial on its face.
183	Chris Hedges, <i>Muslims From Afar Joining 'Holy War' in Bosnia</i> , New York Times, December 5, 1992.	Averment at ¶¶ 449, 450	1, 3, 4, 7, 8	Newspaper article. Concerns alleged support by charity organizations for individuals fighting in Bosnia in 1992.
184	U.S. Treasury Department Designates Two Individuals With Ties to Al Qaida, UBL Former BIF Leader and Al Qaida Associate Named Under E.O. 13224, December 21, 2004.	Averment at ¶ 450	1, 3, 4, 7	Press release. Concerns alleged involvement in terrorist funding by charity official.
185	<i>U.S. Links Bin Laden to Chechnya</i> , NBC News, August 1999.	Averment at ¶ 453	1, 3, 4, 7	News article from website. Concerns alleged funding of terrorist activities outside the United States.
186	India Today Magazine, <i>SIMI: Bitter With India, Safdar Nagori, SIMI's Secretary General Speaks to Sayantan Chakravarty</i> , August 20, 2008.	Averment at ¶ 457	1, 3, 4, 7, 8	Magazine article. Concerns alleged indirect funding of terrorism outside the United States. (Contrary to Averment ¶ 457, the article does not mention WAMY.)
187	<i>Terrorism, Al Qaeda, and the Muslim World; The Challenge Within the Muslim World</i> , Hearing before the National Commission on Terrorist Attacks Upon the United States, Testimony of Steven Emerson, July 9, 2003.	Averment at ¶¶ 445, 446, 460, 461, 464	2, 3, 4, 8	Written testimony before 9/11 Commission. Lacks a basis in personal knowledge. Concerns alleged advocacy of extremist and terrorist activities, and alleged links of charity employees to terrorist organizations outside the United States.
188	Jerry Markon, <i>U.S. Raids N. Va. Office of Saudi-Based Charity</i> , Washington Post, June 2, 2004.	Averment at ¶ 462	1, 3, 4, 6	Newspaper article. Concerns the preliminary stages of an investigation.

1. Unsworn hearsay

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189	Sarah Boesveld, <i>Canadian Muslim Youth Group Tied to Al-Qaeda Stripped of Charitable Status</i> , National Post, March 6, 2012.	Averment at ¶¶ 466-471	1, 3, 4, 7, 8	Newspaper article. Concerns alleged transfers of funds from charities to terrorist organizations outside the United States.
190	August 23, 2011 letter from the Canada Revenue Agency to Mr. Ayman al Taher, President of the World Assembly of Muslim Youth, regarding the "Audit of the World Assembly of Muslim Youth."	Averment at ¶¶ 466-471	1, 3, 4, 6, 7, 8	Letter from unnamed official of Canadian Revenue Agency. Concerns the preliminary stages of an investigation. Concerns alleged transfers of funds from charities to terrorists outside the United States.
191	January 5, 2012 letter from the Canada Revenue Agency to Mr. Ayman al Taher, President of the World Assembly of Muslim Youth, regarding the "Notice of Intention to Revoke the World Assembly of Muslim Youth."	Averment at ¶¶ 466-471	1, 3, 4, 7, 8	Letter from Canadian revenue agency. Concerns alleged transfers of funds from charities to terrorists outside the United States.
192	U.S. Treasury Department Designates Benevolence International Foundation and Related Entities as Financiers of Terrorism, November 19, 2002.		1, 3, 4, 7, 8	Press release. Concerns alleged support of charities for terrorists outside the United States.
193	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mammar Ameur (ISN No. 939), April 13, 2005, July 25, 2005.	Averment at ¶ 474	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged association of detainee with a charity employee outside the United States.
194	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Adel Hassan Hamed (ISN No. 940), November 19, 2004, March 25, 2005	Averment at ¶ 475	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged diversion of funds to terrorist groups by a charity employee.
195	Affidavit of Khalid bin Obaid Azzahri, Financial and Administrative Manager of Al Haramain Islamic Foundation, April 7, 2004.	Averment at ¶ 478	4, 8	Affidavit. Concerns the relationship between the Kingdom and a charity that is alleged to have transferred funds to terrorist groups.

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
196	Sharon LaFraniere, <i>How Jihad Made its Way to Chechnya; Secular Separatist Movement Transformed by Militant Vanguard</i> , Washington Post, April 26, 2003.	Averment at ¶¶ 478, 482	1, 3, 4, 7, 8	Newspaper article. Concerns alleged funding by charity organizations for terrorist organizations outside the United States.
197	Statement by Sheikh Muhmad al Tujri, Chairman of the Al Haramain Islamic Foundation's Africa Committee, www.alharamain.org.	Averment at ¶ 478	1, 5	Statement in Arabic. No authentication or translation, certified or otherwise. No indication that the Arabic statement was sworn or otherwise admissible.
198	National Commission on Terrorist Attacks Upon the United States, Monograph on Terrorist Financing, Chapter 7, <i>Al Haramain Case Study</i> , pp. 114-130.	Averment at ¶ 479	1, 4, 8	Monograph by the staff of the 9/11 Commission. Concerns the relationship between the Kingdom and a charity that is alleged to have transferred funds to terrorist groups.
199	Diplomatic Cable, Secretary of State, <i>Terrorism Financing: Updated Nonpaper on Al Haramain</i> , January 28, 2003.	Averment at ¶ 480	1, 3, 4, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged transfers of funds from a charity to terrorist groups outside the United States.
200	Republic Secretariat for Relations with the International Criminal Tribunal in the Hague and War Crimes Research, <i>Terrorism: Global Network of Islamic Fundamentalists - Part I -Modus Operandi -Model Bosnia</i> , April 2004.	Averment at ¶ 481	1, 3, 4, 6, 7, 8	Paper from Bosnian Serb Republic quoting a "Bosnian Intelligence Memo." Portion quoted appears to consist of preliminary investigative findings. Concerns alleged transfers of funds from a charity to terrorist groups outside the United States.
201	Remarks by U.S. Treasury Department Secretary Paul O'Neill on New U.S.-Saudi Arabia Terrorist Financing Designations, March 11, 2002.	Averment at ¶ 483	1, 4, 7, 8	Press release with prepared remarks. Concerns alleged support for terrorism by charities outside the United States.
202	U.S. Treasury Department Executive Order 13224 designation summaries for Al Haramain Islamic Foundation's branch offices.	Averment at ¶ 483	1, 3, 4, 5, 7, 8	Excerpt from unsigned, untitled document. Concerns alleged support for terrorism by charities outside the United States.
203	U.S. Treasury Department Announces Joint Action with Saudi Arabia Against Four Branches of Al-Haramain in the Fight Against Terrorist Financing, January 22, 2004.	Averment at ¶¶ 484-487, 502	1, 3, 4, 7, 8	Press release. Concerns alleged support for terrorism by charities outside the United States.

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204	Additional Al-Haramain Branches, Former Leader Designated by Treasury as Al Qaida Supporters, Treasury Marks Latest Action in Joint Designation with Saudi Arabia, June 2, 2004.	Averment at ¶¶ 488-490	1, 3, 4, 7, 8	Press release. Concerns alleged support for terrorism by charities outside the United States.
205	U.S. Treasury Department Executive Order 13224 Designation Memorandum for Al Haramain Islamic Foundation's branch offices in Afghanistan, Albania, Bangladesh, Ethiopia and The Netherlands, and Aqeel Abdelaziz al Aqil.	Averment at ¶ 491	1, 3, 4, 7, 8	Redacted memorandum, apparently from the Treasury Department. Concerns alleged support for terrorism by charities outside the United States.
206	U.S.-Based Branch of Al Haramain Foundation Linked to Terror, Treasury Designated U.S. Branch, Director, September 9, 2004.	Averment at ¶¶ 492, 502	1, 3, 4, 6, 8	Press release. Concerns preliminary stages of an investigation. Concerns alleged support for terrorism by a charity and its director.
207	Diplomatic Cable, U.S. Embassy Riyadh, <i>Terrorism Finance: UNSC 1267 Designee, Suliman al-Buthe, Featured in Local Press, Still on SAG Payroll</i> , October 17, 2006.	Averment at ¶ 492	1, 3, 4, 5, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns alleged support for terrorism by a former charity official.
208	Internal Revenue Service Form 990 for Al Haramain Islamic Foundation, Inc. (2001).	Averment at ¶ 493	1, 8	Tax return prepared by charity. Apparently offered to show the association with a charity of individuals who allegedly supported terrorism.
209	Excerpts from the Articles of Incorporation of Al Haramain Islamic Foundation, Inc., February 11, 1999.	Averment at ¶ 493	1, 8	Articles of incorporation for charity. Apparently offered to show the association with a charity of individuals who allegedly supported terrorism.
210	<i>In the Matter of the Search of One Story Residential Building Located at 3800 S. Highway 99 in Ashland, Oregon</i> , Application and Affidavit of Colleen Anderson, Special Agent, Internal Revenue Service, Criminal Investigation, February 13, 2004.	Averment at ¶¶ 495-500	2, 8	Affidavit. Only partially based on personal knowledge. Concerns alleged funding of extremist militants in Chechnya by a charity and its officials. See Reply 10 & n.15.
211	Transcript, <i>U.S. v. Usama Bin Laden</i> , Case No. S(7) 98 Cr. 1023, May 1, 2001.	Averment at ¶ 502	1, 3, 4, 8	Trial transcript excerpt containing closing argument of counsel (not witness testimony). Offered for statements concerning terrorist activities outside the United States.

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212	Transcript, <i>U.S. v. Usama Bin Laden</i> , Case No. S(7) 98 Cr. 1023, May 2, 2001.	Averment at ¶ 502	1, 3, 4, 8	Trial transcript excerpt containing closing argument of counsel (not witness testimony). Offered for statements concerning terrorist activities outside the United States.
213	U.S. Treasury Department Designated Al Haramain Islamic Foundation, June 19, 2008.	Averment at ¶ 503	1, 3, 4, 8	Press release. Concerns alleged transfers of funds from a charity to terrorists.
214	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Zaid Muhammad Sa' ad al Husayn (ISN No. 050), April 2, 2005, December 5, 2005, February 23, 2006.	Averment at ¶ 509	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged advocacy of extremist activities occurring outside the United States.
215	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdel Hadi Mohammed Badan al Sebail Sebail (ISN No. 064), September 25, 2004, May 13, 2005, July 18, 2005.	Averment at ¶ 510	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States.
216	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdul Rahman Owaid Mohammad al Juaid (ISN No. 179), September 27, 2004, September 20, 2005, May 1, 2006, March 3, 2007.	Averment at ¶ 511	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged donation to a charity by an alleged member of a terrorist organization outside the United States.
217	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Fahd Muhammad Abdullah al Fouzan (ISN No. 218), February 27, 2006, February 14, 2007.	Averment at ¶ 513	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States.
218	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Wasm Awad Umar Wasim (ISN No. 338), October 7, 2004, July 11, 2005, February 17, 2006, April 6, 2006.	Averment at ¶ 514	1, 2, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. To the extent the detainee's own statements are paraphrased, not clear whether they were sworn. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States.

1. Unsworn hearsay
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219	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Sami al Haj (ISN No. 345), July 8, 2005, September 4, 2006, September 11, 2007, April 4, 2008.	Averment at ¶ 515	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Concerns alleged links between a charity and terrorist organizations outside the United States.
220	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Jamal Muhammad Alawi Mari (ISN No. 577), September 22, 2004, October 26, 2005, November 25, 2006, January 11, 2008, May 5, 2008.	Averment at ¶¶ 516, 517	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Concerns alleged links between a charity and terrorist organizations outside the United States and alleged advocacy of extremist activities outside the United States.
221	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Khalid Mahomoud Abdul Wahab al Asmr (ISN No. 589), March 6, 2004 November 9, 2004.	Averment at ¶ 518	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. To the extent the detainee's own statements are paraphrased, not clear whether they were sworn. Includes preliminary accusations in another proceeding. Concerns alleged links between a charity and terrorist organizations outside the United States.
222	Declaration of Dr. Mutlib bin Abdullah al Nafissa, Member of the Council of Ministers, January 31, 2004.	Averment at ¶ 521	7, 8	Same document as Exhibit 1, and immaterial for the same reasons given above.
223	Declaration of Saud bin Mohammad al Roshood, Director of the Executive Office of the Saudi High Commission, February 17, 2004.	Averment at ¶ 522	7, 8	Declaration discussing the relationship between the Kingdom and the SHC. Offered to show the relationship between the Kingdom and a charity as to which no action in the United States has been alleged.
224	Declaration of Ali Ahmad Ali Hamad, March 4, 2008 (English and Arabic).	Averment at ¶¶ 525-527	2, 7, 8	Declaration. Concerns alleged support for terrorist organizations by a charity outside the United States.
225	Recorded Witness Statement of Ali Ahmad Ali Hamad, March 4, 2008.	Averment at ¶¶ 525-527	2, 7, 8	Transcribed oral witness statement. Concerns alleged support for terrorist organizations by a charity outside the United States.
226	Saudi High Commission Employment Certificate for Ali Ahmad Ali Hamad, December 30, 1996.	Averment at ¶¶ 525-527	7, 8	Certificate of employment. Offered to show alleged support for terrorist organizations by a charity outside the United States.

1. Unsworn hearsay
2. Hearsay without cross-examination
3. Hearsay within hearsay

4. Lack of personal knowledge
5. Unauthenticated
6. Preliminary investigative stages

7. Events outside the United States
8. Allegations of indirect funding

Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
227	Transcript, Testimony of Ali Ahmad Ali Hamad before the International Criminal Tribunal for the Former Yugoslavia ("ICTY") (September 8, 2007) [Ali Hamad testifies that the Saudi High Commission provided considerable assistance to the Bosnian mujahideen and the "Zubeir" unit that Ali Hamad commanded. According to Ali Hamad: (i) the Zubeir unit was formed by the main al Qaeda cell outside Bosnia-Herzegovina; (ii) al Qaeda made the determination that Hamad would join the Zubeir unit and thus informed him of the decision; (iii) Hamad says that the Zubeir unit was a completely separate mujahedin unit from others in the area; (iv) the Saudi High Commission provided more assistance to the Zubeir unit than other mujahideen units.].	Averment at ¶¶ 525-527	2, 7, 8	Transcript of trial testimony. Concerns alleged support for terrorist organizations by a charity outside the United States.
228	FBI Report, <i>Murder of William Arnold Jefferson, November 18, 1995, Interview of Ali Ahmed Ali Hamad.</i>	Averment at ¶¶ 525-527, 532	1, 3, 4, 7	Memorandum recording witness statements. Concerns alleged terrorist actions outside the United States. States on its face that it contains "neither recommendations nor conclusions of the FBI."
229	Diplomatic Cable, U.S. Embassy Sarajevo, <i>Terrorist Finance: Bosnia's Dirty Dozen</i> , November 2002.	Averment at ¶ 528	1, 3, 4, 6, 7, 8	Diplomatic cable. Concerns preliminary investigations and accusations against charities operating outside the United States.
230	Official Record from the Republic of Bosnia and Herzegovina, Ministry of the Interior, State Security Service ("Official Secret"; "Strictly Confidential"), October 23, 1995.	Averment at ¶ 529	1, 3, 4, 5, 7, 8	Translation of memorandum purportedly entitled "Official Record," purportedly recording wiretapped conversations. The translation is neither authenticated nor certified. Concerns allegations of financial support from a charity to extremists outside the United States.

1. Unsworn hearsay  
2. Hearsay without cross-examination  
3. Hearsay within hearsay
4. Lack of personal knowledge  
5. Unauthenticated  
6. Preliminary investigative stages
7. Events outside the United States  
8. Allegations of indirect funding

Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
231	Federal Office of Criminal Investigation, Expert Report Concerning the Area - Financial Investigations - Relating to the Judicial Assistance Request, Ref. No. INV/10289/T09-PH (245), dated 8/27/2002 of the "Office of the Prosecutor" (OTP) of the International Court of Criminal Justice for the former Yugoslavia relating to the "Third World Relief Agency" (TWRA), Vienna/Austria (also referred to as the "TWRA Report"), August 8, 2003.	Averment at ¶ 530	1, 3, 4, 6, 7, 8	Report by an author referring to itself as the "Federal Office of Criminal Investigation," apparently part of the government of Germany. Appears to reflect preliminary accusations in another proceeding (see page 63, requesting "examination regarding the accusations raised"). Concerns alleged financial support provided to a charity with alleged links to terrorism, outside the United States.
232	Adam Kredo, <i>Saudi Arabia's New King Helped Fund Radical Terrorist Groups</i> , Washington Free Beacon, January 26, 2015.	Averment at ¶ 533	1, 3, 4, 6, 7, 8	Online news article. Offered for statements about the preliminary stages of an investigation. Concerns alleged support for terrorist activities by charity employees outside the United States.
233	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Bensayah Belkacem (ISN No. 10001), September 24, 2004, December 28, 2005, November 19, 2006, April 28, 2008.	Averment at ¶¶ 535-539	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States.
234	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Saber Mahfouz Lahmar (ISN No. 10002), September 23, 2004, November 29, 2005, October 25, 2006, April 17, 2008.	Averment at ¶ 540	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States, and alleged support for terrorist organizations by a charity outside the United States.
235	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mohammed Nechle (ISN No. 10003), September 23, 2004, November 17, 2005, November 7, 2006, April 5, 2008.	Averment at ¶¶ 541, 554	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States, and alleged support for terrorist organizations by a charity outside the United States.

1. Unsworn hearsay
2. Hearsay without cross-examination
3. Hearsay within hearsay

4. Lack of personal knowledge
5. Unauthenticated
6. Preliminary investigative stages

7. Events outside the United States
8. Allegations of indirect funding

Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
236	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mustafa Ait Idr (ISN No. 10004), September 21, 2004, December 7, 2005, November 29, 2006, June 30, 2008.	Averment at ¶ 541	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States, and alleged support for terrorist organizations by a charity outside the United States.
237	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Lakhdar Boumediene (ISN No. 10005), September 21, 2004, November 30, 2005, October 20, 2006, April 1, 2008.	Averment at ¶¶ 541, 554	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States, and alleged support for terrorist organizations by a charity outside the United States.
238	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Boudella al Hajj (ISN No. 10006), October 6, 2004, November 30, 2005, November 20, 2006, May 5, 2008.	None provided	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged terrorist activities by a charity employee outside the United States, and alleged support for terrorist organizations by a charity outside the United States.
239	Defense Intelligence Agency Report, <i>IIR [REDACTED] Aided Receives Humanitarian Aid and Weapon Shipments From Saudi Arabian Relief Organization.</i>	Averment at ¶ 542	1, 3, 4, 5, 7, 8	Partially redacted report labeled "Department of Defense" with no named author. Concerns alleged support for an individual allegedly linked to terrorist organizations by a charity organization outside the United States. States on its face that it is an "information report, not finally evaluated intelligence."
240	Declaration of Abdul Rahman al Swailem, President of the Saudi Arabian Red Crescent Society, April 2, 2004 (ECF No. 96-2).	Averment at ¶ 545	7, 8	Declaration discussing the relationship between the Kingdom and the Saudi Red Crescent. Offered to show the relationship between the Kingdom and a charity as to which no action in the United States has been alleged (and which has already been dismissed on that basis).

1. Unsworn hearsay  
2. Hearsay without cross-examination  
3. Hearsay within hearsay

4. Lack of personal knowledge  
5. Unauthenticated  
6. Preliminary investigative stages

7. Events outside the United States  
8. Allegations of indirect funding

Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
241	Declaration of Abdul Rahman al Swailem, President of the Saudi Arabian Red Crescent Society, April 2, 2004 (ECF No. 96-3).	Averment at ¶ 545	7, 8	Declaration discussing the relationship between the Kingdom and the Saudi Red Crescent. Offered to show the relationship between the Kingdom and a charity as to which no action in the United States has been alleged (and which has already been dismissed on that basis).
242	James Rupert, <i>Dreams of Martyrdom Draw Islamic Arabs to Join Afghan Rebels</i> , Washington Post, July 21, 1986.	Averment at ¶ 547	1, 3, 4, 7, 8	Newspaper article. Concerns alleged assistance provided by a charity to militant or extremist individuals (in Afghanistan in the 1980s).
243	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mohamed Atiq Awayd al Harbi (ISN No. 333), July 5, 2005, April 23, 2006, March 3, 2007.	Averment at ¶ 556	1, 2, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Includes preliminary accusations in another proceeding. Concerns alleged donations made to a charity by an alleged member of a terrorist organization.
244	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Said Ali al Shihri (ISN No. 372), December 10, 2004, June 16, 2005, April 13, 2007.	Averment at ¶ 557	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged donations made to a charity by an alleged member of a terrorist organization.
245	U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Muhamed Hussein Abdallah (ISN No. 704), December 10, 2004, April 22, 2005, July 26, 2005.	Averment at ¶ 558	1, 3, 4, 6, 7, 8	Summary of evidence to be presented against a detainee at Guantanamo Bay, relying in part on anonymous sources. Consists of preliminary accusations in another proceeding. Concerns alleged donations made to a charity by an alleged member of a terrorist organization. (Does not contain the quoted passage at the end of Averment ¶ 558.)
246	High Order No. 7/B/1863 (the "Albanian High Order"), May 19, 1999.	Averment at ¶ 559	7, 8	English translation of an order establishing the SJRC. Offered to show the relationship between the Kingdom and a charity as to which no action in the United States has been alleged (and which has already been dismissed on that basis).
247	Declaration of Dr. Abdulrahman A. Al-Suwailem, President of the Saudi Joint Relief Committee and the Saudi Red Crescent Society, January 10, 2005.	Averment at ¶ 560	7, 8	Declaration. Offered to show the relationship between the Kingdom and a charity as to which no action in the United States has been alleged (and which has already been dismissed on that basis).

1. Unsworn hearsay

2. Hearsay without cross-examination

3. Hearsay within hearsay

4. Lack of personal knowledge

5. Unauthenticated

6. Preliminary investigative stages

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
248	U.S. Treasury Department Designates Bosnian Charities Funneling Dollars to Al Qaida, May 6, 2004.	Averment at ¶ 562	1, 3, 4, 7, 8	Press release. Concerns the relationship between one charity and other charities with alleged links to terrorism, all outside the United States.
249	U.S. Treasury Department Executive Order 13224 designation summary for Al Haramain Al Masjed Al Aqsa Charity Foundation.	Averment at ¶ 562	1, 3, 4, 7, 8	Web page. Concerns the relationship between one charity and other charities with alleged links to terrorism, all outside the United States.
250	INTERPOL Fusion Taskforce Report, <i>Financing of Terrorism and Charities</i> , Booklet 3, July 2003.	Averment at ¶¶ 564, 565, 571	1, 3, 4, 7, 8	Police report, relying in part on anonymous sources. Concerns alleged support for terrorism by charity employees outside the United States. States on its face that it is "for law enforcement use" and "intelligence purposes," and is "not meant to be used as evidence."
251	INTERPOL Fusion Taskforce Report, <i>Financing of Terrorism</i> , March 2003.	Averment at ¶ 564	1, 3, 4, 7, 8	Police report, relying in part on anonymous sources. Concerns alleged support for terrorism by charity employees outside the United States. States on its face that it is "for law enforcement use" and "intelligence purposes," and is "not meant to be used as evidence."
252	INTERPOL Fusion Taskforce Report, <i>Financing of Terrorism and Charities</i> , Booklet 2, July 2003.	Averment at ¶¶ 564, 565	1, 3, 4, 7, 8	Police report, relying in part on anonymous sources. Concerns alleged support for terrorism by charity employees outside the United States. States on its face that it is "for law enforcement use" and "intelligence purposes," and is "not meant to be used as evidence."
253	Stephen Schwartz, <i>Islamic Fundamentalism in the Balkans</i> , Partisan Review, August 1, 2000.	Averment at ¶ 566	1, 3, 4, 6, 7, 8	Magazine article. Concerns activities of charities outside the United States, including a brief reference to preliminary accusations of terrorist activity.
254	Fawaz Mohmmad, <i>Riyadh to Close Charities Oversees</i> , IslamOnline.net, March 29, 2004.	Averment at ¶ 566	1, 3, 4, 7, 8	Online news article. Concerns alleged transfers of funds from charities to terrorist organizations outside the United States.
255	Glenn R. Simpson, <i>Terror Finance: U.S. Tracks Saudi Bank Favored by Extremists</i> , Wall Street Journal, July 26, 2007, including Excerpt from 2003 CIA Report.	Averment at ¶ 571	1, 3, 4, 7, 8	Newspaper article. Concerns alleged transfers of funds from charities to terrorist organizations outside the United States.

1. Unsworn hearsay
2. Hearsay without cross-examination
3. Hearsay within hearsay

4. Lack of personal knowledge
5. Unauthenticated
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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
256	<i>U.S. Vulnerabilities to Money Laundering, Drugs, and Terrorist Financing: HSBC Case History</i> , U.S. Senate Permanent Subcommittee on Investigations, July 17, 2012, pp. 193- 202.	Averment at ¶ 571	1, 3, 4, 6, 8	Excerpt from legislative report. Concerns various preliminary investigations. Concerns alleged transfers of funds from charities to terrorist organizations.
257	Diplomatic Cable, Secretary of State, <i>Joint Examination of Al Rajhi Bank Through the Joint Terrorist Financing Task Force</i> , November 25, 2004.	Averment at ¶ 571	1, 3, 4, 7, 8	Cable purportedly leaked from U.S. diplomatic sources and placed on the website "Wikileaks." Concerns proposed actions to investigate and prevent indirect terrorist funding outside the United States.
258	British Intelligence Report ["A most reliable and sensitive source advises that KbM/NCB has channeled funds to OBL on behalf of some of the Saudi Royal family, as insurance against attack on their various assets."].	Averment at ¶ 572	1, 3, 4, 5, 7, 8	Untitled document by unidentified author. Concerns alleged "chanell[ing]" of funds from unidentified members of "the Saudi Royal family" to a terrorist organization, apparently outside the United States.
259	<i>Al Qaeda and Terrorism's Global Reach</i> , Hearing before the U.S. House Committee on International Relations, Testimony of Vincent Cannistraro, Former CIA Chief of Counterterrorism Operations and Analysis, October 3, 2001.	Averment at ¶ 572	2, 4, 7, 8	Legislative testimony. Concerns alleged funding of a terrorist organization by Saudi "businessmen" outside the United States.
260	U.S. Treasury Department Executive Order 13224 Designation Memorandum for Yassin al Kadi (Version #1 ).	Averment at ¶ 572	1, 3, 4, 7, 8	Partially redacted memorandum from Treasury Department designating a private individual as having supported terrorism. Concerns alleged transfers of funds from charities to terrorists outside the United States.
261	U.S. Treasury Department Executive Order 13224 Designation Memorandum for Yassin al Kadi (Version #2).	Averment at ¶ 572	1, 3, 4, 7, 8	Memorandum from Treasury Department designating a private individual as having supported terrorism. Concerns alleged transfers of funds and other assistance from charities to terrorists outside the United States.
262	Statement of Yassin Abdullah Kadi, <i>In the Matter of Yassin Abdullah Kadi and the Office of Foreign Assets Control, U.S. Department of the Treasury</i> .	Averment at ¶ 572	2, 7, 8	Statement by private individual to department contesting designation. Concerns alleged association with a charity official allegedly linked to terrorist organizations.

1. Unsworn hearsay
2. Hearsay without cross-examination
3. Hearsay within hearsay

4. Lack of personal knowledge
5. Unauthenticated
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7. Events outside the United States
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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
263	Memorandum in Support of Defendants' Motion to Dismiss or in the Alternative, For Summary Judgment, <i>Yassin Abdullah Kadi v. Timothy Geithner, et al.</i> , Civil Action No. 09-0108 (JDB), May 22, 2009.	Averment at ¶ 572	1, 3, 4, 7, 8	Legal brief. Concerns alleged transfers of funds and other assistance from charities to terrorists outside the United States.
264	November 29, 2001 letter from David D. Aufhauser, Treasury Department General Counsel, to Switzerland's M. Claude Nicati, Substitut du Procureur General, regarding Yassin A. Kadi.	Averment at ¶ 572	1, 3, 4, 7, 8	Letter summarizing information concerning decision to block private individual's assets. Concerns alleged association of private individual with terrorist organizations and members of such organizations, all outside the United States.
265	German Internal Intelligence Service, Summary of Findings, Investigation of Yassin Qadi and Muwafaq.	Averment at ¶ 572	1, 3, 4, 7, 8	Undated document attributed to "German Internal Intelligence Service." Author is not identified. Appears to be a translation, but translator is not identified and translation is not certified. Concerns alleged connections between charities and terrorist organizations, all outside the United States.
266	Transcript, International Criminal Tribunal for the Former Yugoslavia, Testimony of Ajman Awad, February 8, 2008 [Awad testifies that he went to Bosnia-Herzegovina in December 1992 intending to fight on the side of Bosnian Muslims. To do so, Awad states that he joined Muwafaq: "In late 1992, I joined the Mowafaq Foundation, humanitarian organisation, and that is the organisation I was a member of when I entered Bosnia and Herzegovina." Awad further testifies that there were several "humanitarian organizations" he was working with in Rijeka in 1992, including IGASA [International Islamic Relief Organization]].	Averment at ¶ 572	2, 7, 8	Trial transcript excerpt. Offered for statements concerning support by charities for alleged terrorist or extremist activities outside the United States.

1. Unsworn hearsay  
2. Hearsay without cross-examination  
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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
267	Transcript, International Criminal Tribunal for the Former Yugoslavia, Testimony of Ajman Awad, February 9, 2008 [Awad again testifies that he came to Bosnia-Herzegovina in late 1992 via the assistance of the Arab humanitarian organization Muwafaq and further states that he received his first uniform from the logistics person of the 7th Muslim Brigade as a gift while he was a member of the humanitarian organization. According to Awad: "Bosniaks considered every Arab who came to - everyone who came to Bosnia and Herzegovina who wore a uniform and wore a beard, they considered them Mujahedin, to be Mujahedin. And even some people who worked for humanitarian organisations, the people in Bosnia referred to them as El Mujahedin."].	Averment at ¶ 572	2, 7, 8	Trial transcript excerpt. Offered for statements concerning support by charities for alleged terrorist or extremist activities outside the United States.

1. Unsworn hearsay

2. Hearsay without cross-examination

3. Hearsay within hearsay
4. Lack of personal knowledge

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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
268	Transcript, International Criminal Tribunal for the Former Yugoslavia, Testimony of Ajman Awad, February 10, 2008 [Awad explains that he joined Muwafaq to get into Bosnia to offer his translation services and participate in the fighting. Moreover, Muwafaq was giving him a salary. "I said that I worked for a humanitarian organisation. I joined the organisation, the Mowafaq foundation, thinking that they were organising training for soldiers in Bosnia and Herzegovina, for Bosniak soldiers in Bosnia and Herzegovina. I wanted to work as an interpreter and translator, and I also wished to participate in the fighting. When I was asked by the director of the humanitarian organisation, the Mowafaq Foundation, who wanted to enter Bosnia or who wanted to go to Bosnia, to be there, and he said that there was a possibility for that, I used that option, and I entered Bosnia and Herzegovina at the expense of the humanitarian organization that I was working for. Excuse me. I was receiving a salary at this organisation, so this is what I used to live on." He further testifies that the "High Saudi Committee" was also active in the territory of Zenica, as well as "Igas" (IIRO) and "Human Relief International."].	Averment at ¶ 572	2, 7, 8	Trial transcript excerpt. Offered for statements concerning support by charities for alleged terrorist or extremist activities outside the United States.
269	Foreign Broadcast Information Service Report, <i>Compilation of Usama Bin Laden Statements, 1994-January 2004</i> [In a June 17, 1996 interview with Osama bin Laden in Cairo, bin Laden expressed his support for "the Muwaffaq Society in Zagreb."].	Averment at ¶ 572	1, 3, 4, 7, 8	Collection of statements attributed to Osama bin Laden. Offered to establish some form of connection or endorsement between a charity and terrorist organizations outside the United States.

1. Unsworn hearsay  
2. Hearsay without cross-examination  
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Ex. No.	Plaintiffs' Description	Plaintiffs' Cite	Reasons Inadmissible and/or Immaterial	Notes
270	Excerpt from the Muslim World League Journal [advertisements for Saudi Joint Relief Committee bank accounts managed by National Commercial Bank and Al Rajhi Banking & Investment Corporation].	Averment at ¶ 573	1, 2, 3	Journal article. Offered to establish some form of connection or endorsement between charities in connection with solicitation of donations outside the United States.
271	Summary of the Saudi National Commercial Bank Audit Report.	Averment at ¶ 574	1, 4, 5, 7, 8	Translation or summary of purported audit report. The report itself is not offered, and the translation or summary is neither authenticated nor certified. Concerns alleged sharing of funds between different charities outside the United States.
272	U.S. Treasury Department Executive Order 13224 designation summary for Rabita Trust.	Averment at ¶ 580	1, 3, 4, 7, 8	Web page. Concerns alleged links between a charity official and terrorists, all outside the United States.
273	Glenn R. Simpson, <i>Saudi Charity Worried French in '94</i> , Wall Street Journal, January 13, 2004.	Averment at ¶ 585	1, 3, 4, 7, 8	Newspaper article. Concerns alleged links between a charity and terrorists, all outside the United States.

1. Unsworn hearsay  
2. Hearsay without cross-examination  
3. Hearsay within hearsay
4. Lack of personal knowledge  
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6. Preliminary investigative stages
7. Events outside the United States  
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